

MEMO ENDORSED

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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/10/2023

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March 9, 2023

BY ECF

Valerie E. Caproni, District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Laureano*, 1:22-cr-00670 (VEC).

Dear Judge Caproni:

I represent Mr. Jonathan Laureano in the above-referenced matter. I write to request a modification of the pretrial briefing schedule – specifically, that portion having to do with expert disclosures and related motions.

The schedule currently requires the defense to make its expert disclosure tomorrow, March 10th; the defense to file its motion to exclude the government's experts March 17th; the government to file its response and cross-motion by March 24th; the defense to file a reply and/or response by March 31st; and the government to file its reply in support of their motion by April 7th.

However, our ballistics expert has not yet examined the ballistics evidence, making it impossible to provide disclosure by tomorrow. Additionally, as I previously informed the Court, I am leaving the country on Sunday on a previously scheduled trip, and will not return until March 22nd.

Therefore, I respectfully request the briefing schedule be modified as follows: the defense to make its expert disclosure by March 27th; the defense to file its motion to exclude the government's experts by March 31st; the government to file its response and cross-motion by April 7th; the defense to file a reply and/or response by April 11th; and the government to file its reply in support of its motion by April 14th.

Hon. Valerie E. Caproni
March 9, 2023

We note this proposal would only delay resolution of issues having to do with experts by one week, and would not affect the parties' ability to begin trial on May 1st, as scheduled.

I have spoken with A.U.S.A. Jeffrey W. Coyle, who does not object to this request.

Thank you for your attention to this application.

Very truly yours,

/s
Jesse M. Siegel

Application GRANTED.

SO ORDERED.



Date: 3/10/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE